

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF ARKANSAS

IN RE: ELVIS A. WOOLSEY

CASE NUMBER: 4:16-bk-16901
CHAPTER 7

MISTY WOOLSEY - PLAINTIFF

V.

ADV. PROC. NO. 4:17-AP-01050

ELVIS A. WOOLSEY - DEFENDANT

MOTION TO QUASH AND BRIEF IN SUPPORT

River Town Bank, by its attorney, Bunny Bullock, states that:

1. On or about October 30, 2017, the attorney for Plaintiff, Misty Woolsey, caused to be served a Subpoena on River Town Bank in the above styled cause of action compelling the production of documents.

2. That the Subpoena is insufficient for several reasons:

- a. The Subpoena was not served upon the registered agent for service of process for River Town Bank.
- b. The Subpoena is unreasonable, oppressive, overly broad, seeks information that is confidential information including information for third parties.
- c. The party causing the issuance of the Subpoena has not agreed to be responsible for the regularly charged fees for compiling the requested documents at the rate of \$30.00 per hour and \$0.25 per page as required.

3. Fed. R. Civ. P. 45 provides that a party requesting production of documents and other tangible items shall be responsible for the cost of procuring those items. The Rule

further provides that a Subpoena Duces Tecum may be modified or limited to alleviate an undue burden.

4. A protective order should be entered in the above styled cause of action modifying or vacating the subpoenas duces tecum and granting River Town Bank an attorney's fee and its costs incurred herein.

5. River Town Bank will provide the information requested only under a protection order if any information is restricted by the Privacy Act.

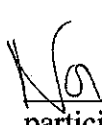
WHEREFORE, River Town Bank requests the relief sought hereinabove, for its attorney's fees and costs incurred herein and for all other and proper relief.

BULLOCK LAW FIRM, P.A.
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PHONE: 479-968-1426

BY


BUNNY BULLOCK
REG #88003

CERTIFICATE OF SERVICE

 I do hereby certify that a copy of the foregoing was delivered on this 9 day of Nov., 2017, via the Court's electronic notification system to all ECF participants.


BUNNY BULLOCK